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UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: ASBESTOS PRODUCTS

LIABILITY LITIGATION (NO.VI)  
Civil Action No. MDL 875

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This Document Relates To:

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IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION

BARBARA ANNE ANDERSON,  
Plaintiff,

v.

ALFA LAVAL, INC., et al.  
Defendants.

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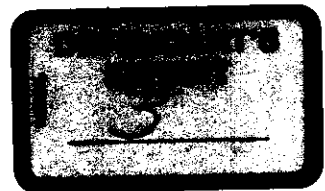
§ Civil Action No. 3:07-CV-00068-HEH

**PLAINTIFF'S RESPONSES TO DEFENDANT, BONDEX INTERNATIONAL, INC.'S  
FIRST SET OF REQUESTS FOR ADMISSIONS, SECOND SET OF  
INTERROGATORIES, AND REQUEST FOR PRODUCTION OF DOCUMENTS**

COMES NOW Plaintiff, Barbara Anne Anderson, through counsel, and responds to Defendant Bondex International, Inc.'s First Set of Requests for Admissions, Second Set of Interrogatories and Request for Production of Documents as follows:

**GENERAL OBJECTIONS**

1. Plaintiff objects to this discovery request to the extent it is vague, overly broad, unduly burdensome, seeks discovery of matters, things, or information not relevant or material to the subject matter in the pending action and not reasonably calculated to lead to the discovery of admissible evidence.
2. Plaintiff objects to this discovery request to the extent it seeks discovery of information



protected from disclosure by the work-product rule, as well as discovery of confidential communications made for the purpose of facilitating the rendition of professional legal services, all of which are protected from discovery by the attorney-client privilege.

3. Plaintiff objects to this discovery request insofar as it seeks information equally accessible to both Plaintiff and Defendants.
4. Plaintiff objects to this discovery request to the extent that it may seek the identity of consulting experts.
5. Plaintiff reserves the right to supplement her responses to these discovery requests as additional information is discovered and in accordance with the Federal Rules of Civil Procedure.

#### **REQUESTS FOR ADMISSIONS**

1. Admit that your claim in this lawsuit of exposure to a RPM product or products that allegedly contained asbestos is limited to the time period during which you worked as a civil servant.

**RESPONSE:** Plaintiff objects to this discovery request to the extent that it is vague and ambiguous with respect to the phrase "time period during which you worked as a civil servant." Subject to and without waiving this objection, admitted.

2. Admit that your claim in this lawsuit to a RPM product or products that allegedly contained asbestos is limited to the premises where you worked during your time as a civil servant.

**RESPONSE:** Plaintiff objects to this discovery request to the extent that it is vague and ambiguous with respect to the phrase "during your time as a civil servant." Subject to and without waiving this objection, admitted.

3. Admit that you are not claiming in this lawsuit that you were exposed to a RPM product or products that allegedly contained asbestos as a result of your father's work at the Norfolk Naval Shipyard.

**RESPONSE:** Admitted.

4. Admit that you are not claiming in this lawsuit you were exposed to a RPM product or products that allegedly contained asbestos as a result of your own personal use of a RPM product or products.

**RESPONSE:** Admitted.

5. Admit that you are not aware of any exposure to a RPM product or products that allegedly contained asbestos at any time other than during the time period you worked as a civil servant.

**RESPONSE:** Plaintiff objects to this discovery request to the extent that it is vague and ambiguous with respect to the phrase "time period you worked as a civil servant." Subject to and without waiving this objection, admitted.

6. Admit that you are not aware of any exposure to a RPM product or products that allegedly contained asbestos at any places other than the buildings you worked in while in the civil service.

**RESPONSE:** Plaintiff objects to this discovery request to the extent that it is vague and ambiguous with respect to the phrase "while in the civil service." Subject to and without waiving this objection, admitted.

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**IN RE: ASBESTOS PRODUCTS**

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Plaintiff,**

**v.**

**ALFA LAVAL, INC., et al.  
Defendants.**

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**Civil Action No. 3:07-CV-00068-HEH**

**PLAINTIFF'S RESPONSES TO DEFENDANT, RPM, INC.'S FIRST SET OF  
REQUESTS FOR ADMISSIONS, INTERROGATORIES, AND REQUEST FOR  
PRODUCTION OF DOCUMENTS**

NOW COMES Plaintiff, Barbara Anne Anderson, through counsel, and responds to Defendant RPM, Inc.'s First Set of Requests for Admissions, Interrogatories and Request for Production of Documents as follows:

**GENERAL OBJECTIONS**

1. Plaintiff objects to this discovery request to the extent it is vague, overly broad, unduly burdensome, seeks discovery of matters, things, or information not relevant or material to the subject matter in the pending action and not reasonably calculated to lead to the discovery of admissible evidence.
2. Plaintiff objects to this discovery request to the extent it seeks discovery of information

protected from disclosure by the work-product rule, as well as discovery of confidential communications made for the purpose of facilitating the rendition of professional legal services, all of which are protected from discovery by the attorney-client privilege.

3. Plaintiff objects to this discovery request insofar as it seeks information equally accessible to both Plaintiff and Defendants.
4. Plaintiff objects to this discovery request to the extent that it may seek the identity of consulting experts.
5. Plaintiff reserves the right to supplement her responses to these discovery requests as additional information is discovered and in accordance with the Federal Rules of Civil Procedure.

#### **REQUESTS FOR ADMISSIONS**

1. Admit that your claim in this lawsuit of exposure to a RPM product or products that allegedly contained asbestos is limited to the time period during which you worked as a civil servant.

**RESPONSE:** Plaintiff objects to this discovery request to the extent that it is vague and ambiguous with respect to the phrase "time period during which you worked as a civil servant." Subject to and without waiving this objection, admitted.

2. Admit that your claim in this lawsuit to a RPM product or products that allegedly contained asbestos is limited to the premises where you worked during your time as a civil servant.

**RESPONSE:** Plaintiff objects to this discovery request to the extent that it is vague and ambiguous with respect to the phrase "during your time as a civil servant." Subject to and without waiving this objection, admitted.

3. Admit that you are not claiming in this lawsuit that you were exposed to a RPM product or products that allegedly contained asbestos as a result of your father's work at the Norfolk Naval Shipyard.

**RESPONSE:** Admitted.

4. Admit that you are not claiming in this lawsuit you were exposed to a RPM product or products that allegedly contained asbestos as a result of your own personal use of a RPM product or products.

**RESPONSE:** Admitted.

5. Admit that you are not aware of any exposure to a RPM product or products that allegedly contained asbestos at any time other than during the time period you worked as a civil servant.

**RESPONSE:** Plaintiff objects to this discovery request to the extent that it is vague and ambiguous with respect to the phrase "time period you worked as a civil servant." Subject to and without waiving this objection, admitted.

6. Admit that you are not aware of any exposure to a RPM product or products that allegedly contained asbestos at any places other than the buildings you worked in while in the civil service.

**RESPONSE:** Plaintiff objects to this discovery request to the extent that it is vague and ambiguous with respect to the phrase "while in the civil service." Subject to and without waiving this objection, admitted.

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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Civil Action No. 3:07-CV-00068-HEH

**PLAINTIFF'S RESPONSES TO DEFENDANT, RPM INTERNATIONAL, INC.'S,  
FIRST SET OF REQUESTS FOR ADMISSIONS, INTERROGATORIES, AND  
REQUEST FOR PRODUCTION OF DOCUMENTS**

NOW COMES Plaintiff, Barbara Anne Anderson, through counsel, and responds to Defendant RPM International, Inc.'s First Set of Requests for Admissions, Interrogatories and Request for Production of Documents as follows:

**GENERAL OBJECTIONS**

1. Plaintiff objects to this discovery request to the extent it is vague, overly broad, unduly burdensome, seeks discovery of matters, things, or information not relevant or material to the subject matter in the pending action and not reasonably calculated to lead to the discovery of admissible evidence.
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#### **REQUESTS FOR ADMISSIONS**

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**RESPONSE:** Plaintiff objects to this discovery request to the extent that it is vague and ambiguous with respect to the phrase "during your time as a civil servant." Subject to and without waiving this objection, admitted.



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**RESPONSE:** Admitted.

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**RESPONSE:** Plaintiff objects to this discovery request to the extent that it is vague and ambiguous with respect to the phrase "time period you worked as a civil servant." Subject to and without waiving this objection, admitted.

6. Admit that you are not aware of any exposure to a RPM product or products that allegedly contained asbestos at any places other than the buildings you worked in while in the civil service.

**RESPONSE:** Plaintiff objects to this discovery request to the extent that it is vague and ambiguous with respect to the phrase "while in the civil service." Subject to and without waiving this objection, admitted.